SCHRAMM & PINES, L.L.C.

SUITE 1404 CHROMALLOY PLAZA

PAUL H. SCHRAMM M. HARVEY PINES DANIEL R. SCHRAMM NORMAN S. NEWMARK DEAN A. SCHRAMM PETER L. HOFFMAN 120 SOUTH CENTRAL AVENUE
ST. LOUIS (CLAYTON), MISSOURI 63105

TELEPHONE (314) 721-5321

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January 19, 1995

VIA FEDERAL EXPRESS

Carol Graszer Ropski

Emergency Support Section

U. S. Environmental Protection Agency (HSE-5J) SECTION

77 West Jackson Boulevard

Chicago, IL 60604

Re: U. S. Paint Corporation Response to Request for Information

Dear Ms. Ropski:

Enclosed are materials provided by U. S. Paint Corporation responsive to your request for information. Should you have any questions, please do not hesitate to contact me.

Sincerely,

SCHRAMM & PINES, L.L.C.

DEAN A. SCHRAMM

DAS/bas

Enclosures

STATE OF MISSOURI) SS COUNTY OF ST. LOUIS)

AFFIDAVIT OF ROBERT F. MEEKS SECRETARY/TREASURER, U. S. PAINT CORPORATION

I, ROBERT F. MEEKS, hereby depose and state under oath as follows, to-wit:

I am the Secretary/Treasurer of U. S. Paint Corporation and have taken responsibility to respond to the request for information pursuant to §104(e) of CERCLA from the United State Environmental Protection Agency, Region 5. A diligent records search has been completed and there has been a diligent interviewing process for all available present and former employees who may have had knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal, or handling practices of U. S. Paint Corporation and its predecessors between 1960 and the present in connection with the aforesaid request.

FURTHER AFFIANT SAYETH NAUGHT.

Robert 7. Meeles

Subscribed and sworn to before me, a Notary Public, this 19th day of January, 1995.

Notary Public (

My Commission Expires:

M. HARVEY PINES
Notary Public - Hotory Soci
State of Misseuri
St. Louis County
My Commission Expires: January 13, 1996

RESPONSES OF U. S. PAINT CORPORATION TO EPA REQUEST FOR INFORMATION PURSUANT TO SECTION 104(e) OF CERCLA

- After interviews with current and previous employees we have been unable to find a person able to provide more detailed or complete response to any Information Request.
- 2. To the best of our knowledge, the answer is no.
- 3. Not applicable due to answer to number 2 above.
- 4. No.
- 5. The liability insurance carrier of U. S. Paint Corporation is:

Royal Insurance Company of America 930 Arrowpoint Blvd. Charlotte, NC 28273-8135

Policy #PSV0162730000 Expiration Date: 8/14/95 Commencement Date: 8/15/94

Liability coverage is \$10,000 for cleaning and removal as a result of a covered peril occurring on the premises of U. S. Paint Corporation at 831 S. 21st Street, St. Louis, Missouri. The policy does contain a "pollution exclusion" clause.

- 6. Enclosed are copies of the income tax returns sent to the Federal Internal Revenue Service in the last three years.
- 7. a.) Enclosed are copies of the Certificate of Incorporation and By-Laws of U. S. Paint Corporation.
 - b.) Enclosed are the financial statements for the last five fiscal years. The statement for the fiscal year ended

- March 31, 1990, is for 7 1/2 months due to the purchase of the company on August 14, 1989. These documents have been marked "Confidential" pursuant to 40 C.F.R. 2.203(b).
- c.) Enclosed is our Balance Sheet for the period ending December 31, 1994. This document has been marked "Confidential" pursuant to 40 C.F.R. 2.203(b).
- U. S. Paint Corporation is a wholly owned subsidiary of:

NOF Corporation Yebisu Garden Place Tower 20-3, Ebisu 4-Chome Shibuya-ku, Tokyo 150 Japan

- 8. Not applicable.
- 9. Not applicable.
- 10. We know of no acts or omissions of any persons including our employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom which relate to the Site.
- 11. a.) U. S. Paint Lacquer and Chemical Company was purchased by Grow Group, Inc., in 1966.
 - b.) From 1966 to August 14, 1989, the name of the company wasU. S. Paint Division of Grow Group, Inc.
- c & d.) U. S. Paint Corporation was incorporated on June 30, 1989.
 - e.) U. S. Paint Corporation is organized and existing under the laws of the State of Delaware.

12. To the best of our knowledge U. S. Paint Lacquer and Chemical Company was a closely held corporation owned by Mr. Joseph M. Dilschnieder from 1936 to 1966. The address was 2101 Singleton Avenue, St. Louis, Missouri 63103 (Singleton no longer exists, it was the street that would run into our dock).

The address for Grow Group, Inc. is below:

Grow Group, Inc. 200 Park Avenue New York, New York 10160

- U. S. Paint Corporation is a wholly owned subsidiary of NOF Corporation, a Japanese corporation, and has been since August 14, 1989 when NOF Corporation (then known as Nippon Oil & Fats Co., Ltd.) purchased the assets of U. S. Paint Division of Grow Group, Inc.
- 13. Same as number 12.
- 14. Not applicable.
- 15. a.) Asset Purchase Agreement dated July 5, 1989.
 - b.) Grow Group, Inc. SellerNippon Oil & Fats Co., Ltd. Buyer
 - c.) Sale of assets of seller's U. S. Paint Division.
- 16. Not applicable.
- 17. Same as answer to number 10 above.
- 18. No.